

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,**

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.**

CIVIL NO. 97-2459 (JAG)

**DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT**

**TRIAL BY JURY IS HEREBY
REQUESTED**

**MOTION FOR DEFAULT AGAINST
DEFENDANT UNITED STATES POSTAL SERVICE (USPS)**

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. On May 3rd, 1999 plaintiff filed an amended complaint in the above captioned case.
2. As of this date Defendant United States Postal Service (USPS) has not answered said amended complaint, notwithstanding the fact that this Honorable Court ordered to answer said amended complaint on or before May 13, 1999. (See Docket #50)
3. An order for default should be entered against defendant USPS.

WHEREFORE, it is respectfully requested from this Honorable Court to enter an order for default against defendant United States Postal Service (USPS)

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on April 5, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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